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Attorneys for Defendants Black & Decker  
(U.S.) Inc. erroneously named and served  
as DeWalt Industrial Tool Co.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

TUBO GIPSON,

Plaintiff,

v.

BLACK & DECKER (U.S.) INC.,

Defendant.

Case No. 3:16-CV-03114-LB

Assigned to: Hon. Laurel Beeler

**STIPULATION OF DISMISSAL  
WITH PREJUDICE**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW INTO COURT**, through undersigned counsel, comes Defendant Black & Decker (U.S.) Inc., and Plaintiff, Tubo Gipson, who, pursuant to the provisions of Federal Rule 41(a)(1), hereby give notice of the Parties agreed stipulation of dismissal, with prejudice, of all claims asserted against Defendant Black & Decker (U.S.) Inc., in the above-captioned Complaint previously filed by Plaintiff, Tubo Gipson in the United States District Court for the Northern District of California.

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**WHEREFORE PREMISES CONSIDERED**, the undersigned counsel respectfully request that the Court grant this their Stipulation of Dismissal With Prejudice and that each party bear its own costs incurred.

Dated: August , 2017

**LESTER & CANTRELL, LLP**

By: \_\_\_\_\_  
Kevin Crisp  
Attorney for Defendant  
BLACK & DECKER (U.S.) INC.

Dated: August , 2017

**LAW OFFICE OF NIKOLAUS W. REED**

By: \_\_\_\_\_  
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Dated: August 2017

**QUIRK LAW GROUP, APC**



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DATED: August 18, 2017